

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

DAVIS INTERNATIONAL, LLC, HOLDEX, LLC,:
FOSTON MANAGEMENT, LTD, and :
OMNI TRUSTHOUSE, LTD, :

Plaintiffs, :

v. :

No. 04-1482-GMS

NEW START GROUP CORP., VENITOM CORP.,:
PAN-AMERICAN CORP., MDM BANK, :
URAL-GORNO METALURAGICAL COMPANY,:
EVRAZ HOLDING, MIKHAIL CHERNOI, :
OLEG DERIPASKA, ARNOLD KISLIN, :
MIKHAIL NEKRICH, and ISKANDER :
MAKMUDOV, :

Defendants. :

**EXHIBITS TO PLAINTIFFS' PLAINTIFFS' BRIEF IN OPPOSITION
TO DEFENDANTS' MOTION TO DISMISS THE COMPLAINT
PURSUANT TO THE DOCTRINE OF DIRECT ESTOPPEL AND TO
ENJOIN PLAINTIFFS FROM RE-FILING THIS ACTION**

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